

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA AT ELKINS**

**FRIEDRICHS HARRIS, ADMINISTRATOR OF  
THE ESTATE OF EVAN M. HARRIS,**

**Plaintiff,**

**v.**

**CIVIL ACTION NO.: 2:16-cv-00046  
JUDGE BAILEY**

**Q&A ASSOCIATES, INC.,  
ANGELA SHOCKLEY, KEITH BISHOP,  
MATTHEW SHOCKLEY, SANDY  
SCHMIEDEKNECHT, and TAMMY ROBBINS.**

**Defendants.**

**DEFENDANTS' PROPOSED VERDICT FORM**

Please respond to the questions listed on this verdict form. When you have reached unanimous agreement as to your verdict, have your Foreperson fill in, date, and sign this verdict form and then return with your verdict to the courtroom.

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1. Do you find that the Plaintiff proved by a preponderance of the evidence that Defendant Q&A Associates, Inc. was negligent in its responsibilities to Evan Harris and that such negligence caused his death?

Yes \_\_\_\_\_

No \_\_\_\_\_

2. Do you find that the Plaintiff proved by a preponderance of the evidence that Defendant Angela Shockley was negligent in her responsibilities to Evan Harris and that such negligence caused his death?

Yes \_\_\_\_\_

No \_\_\_\_\_

3. Do you find that the Plaintiff proved by a preponderance of the evidence that Defendant Keith Bishop was negligent in his responsibilities to Evan Harris and that such negligence caused his death?

Yes \_\_\_\_\_

No \_\_\_\_\_

4. Do you find that the Plaintiff proved by a preponderance of the evidence that Defendant Matthew Shockley was negligent in his responsibilities to Evan Harris and that such negligence caused his death?

Yes \_\_\_\_\_

No \_\_\_\_\_

5. Do you find that the Plaintiff proved by a preponderance of the evidence that Defendant Sandy Schmiedeknecht was negligent in her responsibilities to Evan Harris and that such negligence caused his death?

Yes \_\_\_\_\_

No \_\_\_\_\_

6. Do you find that the Plaintiff proved by a preponderance of the evidence that Defendant Tammy Robbins was negligent in her responsibilities to Evan Harris and that such negligence caused his death?

Yes \_\_\_\_\_

No \_\_\_\_\_

(If you marked "**No**" to **ALL** of the above questions, you have completed your deliberations. Please sign, date and return the verdict form and notify the bailiff.

If you marked "**Yes**" to **ANY** of above questions, please identify the amount of compensatory damages you award to Friedrichs Harris as the administrator of the

estate of Evan Harris for sorrow, mental anguish, and solace suffered as a result of Evan Harris's death.

\$ \_\_\_\_\_

If you marked "Yes" to **MORE THAN ONE** of above questions, please identify the percentage of each Defendant's conduct that caused the injury to Friedrichs Harris as the administrator of the estate of Evan Harris for sorrow, mental anguish, and solace suffered as a result of Evan Harris's death.

Q&A Associates, Inc.	_____ %
Angela Shockley	_____ %
Keith Bishop	_____ %
Matthew Shockley	_____ %
Sandy Schmiedeknecht	_____ %
Tammy Robbins	_____ %

7. Do you find by clear and convincing evidence that the damages suffered by Friedrichs Harris as the administrator of the estate of Evan Harris were the result of the conduct that was carried out by the Defendants with actual malice toward Evan Harris or a conscious, reckless and outrageous indifference to the health, safety and welfare of Evan Harris?

Yes \_\_\_\_\_

No \_\_\_\_\_

If you answered YES set forth below your award of punitive damages to the Plaintiff as against the Defendants. If your answer to this question is NO, sign the space below and return it to the Court.

\$\_\_\_\_\_

Dated: \_\_\_\_\_

\_\_\_\_\_  
Jury Foreperson

**DEFENDANTS,**

**By Counsel**

/s/ Lindsey M. Saad

Lindsey M. Saad (WV Bar No. 11155)

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**Defendants.**

**CERTIFICATE OF SERVICE**

I certify that on this 7th day of May, 2018, I filed electronically via CM/ECF a true copy of “**DEFENDANTS’ PROPOSED VERDICT FORM**” with notice of the same being electronically served by the Court to the following:

David A. Sims, Esq.  
Law Offices of David A. Sims, PLLC  
P.O. Box 5349  
Vienna, WV 26105

/s/ Lindsey M. Saad  
Lindsey M. Saad (WV Bar No. 11155)